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January 8, 2025

**Via ECF**

Judge Diane Gujarati  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Re: Marquez v. Indian Taj, Inc., et als.*  
*Case No. 20-CV-05855*

Dear Judge Gujarati:

As the Court may recall, we represent defendant Joginder Singh in the above referenced matter. We have now also been retained by defendant Mehanga Singh and write pursuant to Your Honor's Rules to request a conference and seek permission to file a motion pursuant to Rule 12(b), 55(c) and/or 60(b)(4) or, alternatively, ask that the Court waive the requirement for a pre-motion conference. The basis of the motion is nearly identical to that made by Joginder Singh. Specifically, Mehanga Singh sold his interest in the restaurant simultaneously with Joginder and the alleged service upon him at the restaurant years later was, therefore, likewise defective and deficient depriving this Court of jurisdiction to enter the default judgment in the first instance.

Thank you in advance for your consideration.

Respectfully submitted,

*Vincent T. Pallaci*

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CC: All counsel via ECF